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PROJECT NO. 51840

RULEMAKING ESTABLISHING	§	PUBLIC UTILITY COMMISSION
ELECTRIC WEATHERIZATION	§	
STANDARDS	§	OF TEXAS

INITIAL COMMENTS OF VESTAS – AMERICAN WIND TECHNOLOGY, INC

Vestas American Wind Technology, Inc (“Vestas”) thanks the Public Utility Commission of Texas (“Commission”) for the opportunity to comment on Project 51840, *Rulemaking Establishing Electric Weatherization Standards*. Vestas designs, manufactures, installs, and services onshore and offshore wind turbines across the globe, with more than 132 GW of wind turbines in 82 countries. In the US, we have nearly 15,000 operational turbines installed, representing more than 25 GWs. In Texas alone, Vestas has installed over 3,000 turbines, representing over 7 GW. As such, we take the effects of Winter Storm Uri on the Texas power system extremely seriously and seek to work with our customers, business partners and decisionmakers in improving the reliability of the Electric Reliability Council of Texas (“ERCOT”) and all North American markets. We respectfully submit comments on the technical limitations of available wind turbine technologies in operating under icy conditions.

Vestas does not offer anti-icing or de-icing options to U.S. customers. Vestas does not evaluate the use of high-cost anti-icing or de-icing options unless annual icing losses are forecasted during project development to reduce production repeatedly and continuously over the course of an entire cold weather season. These conditions have not been met for any Vestas wind farm in the United States.

Vestas does offer a low temperature package that comes standard in most new turbines in North America. Low temperature packages are designed to enable operations to -30° C but are not designed to remove or prevent ice accumulation on the turbines.

Vestas continues to evaluate new technologies for its customers and regions, but at this time, there are no commercially viable anti-icing or de-icing solutions for the Texas market.

Vestas appreciates the Commission's evaluation of electric weatherization standards and hopes the Commission will take into account the above comments when designing the final weatherization ruling.

Respectfully submitted,

A handwritten signature in cursive script, reading "Laura Beane", written over a horizontal line.

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A handwritten signature in cursive script, reading "Jon R. Chase", written over a horizontal line.

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